

EXHIBIT J

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Kimberly Lexlaura Bunting

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I N D E X

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E X H I B I T S

NO.	DESCRIPTION	PAGE
	(No exhibits were marked.)	

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1 - - -

2 THE COURT REPORTER: All
3 parties to this deposition are appearing
4 remotely and have agreed to the witness
5 being sworn in remotely. Due to the
6 nature of remote reporting, please pause
7 briefly before speaking to ensure all
8 parties are heard completely.

9 Counsel, please state your
10 appearance.

11 MS. KRAMER: Mary Kramer for
12 the plaintiff, Ric Szabo.

13 MR. STAPP: Greg A. Stapp for
14 Muncy Industries.

15 - - -

16 KIMBERLY LEXLAURA BUNTING,
17 after having been first duly sworn, was
18 examined and testified as follows:

19 BY MS. KRAMER:

20 Q. Good afternoon, Miss Bunting. My
21 name is Mary Kramer and I am one of the
22 attorneys representing Ric Szabo in the matter
23 he has brought against Muncy Industries.

24 The reason I have asked you

1 here today is just to ask you about what facts
2 you have personal knowledge of and after I am
3 finished, Attorney Stapp may have some
4 follow-up questions and we'll be done here.
5 Okay?

6 A. Okay.

7 Q. I would like to go over just a few
8 instructions with you.

9 Have you ever had your
10 deposition taken before?

11 A. No. This is my first time.

12 Q. So with that in mind, I am going to
13 ask you to allow me to finish asking my
14 question before answering and, likewise, I
15 will do my best to allow you to finish
16 answering before I ask you my next question.
17 Okay?

18 A. Okay.

19 Q. I will also ask that you keep your
20 responses verbal instead of nodding or shaking
21 your head or saying uh-huh or unh-unh.
22 Because, otherwise, the court reporter will
23 have a difficult time getting everything down.
24 Okay?

1 A. Okay.

2 Q. Thank you. Are you represented by
3 an attorney today?

4 A. No, I am not.

5 Q. So if Attorney Stapp has an
6 objection, I will just ask that you allow us
7 to resolve the objection, and then go ahead
8 and answer the question.

9 Finally, if at any time you
10 need a break -- I don't think this will take
11 too long -- just let me know, and I will be
12 happy to take a break. I would just ask that
13 you finish the question before we pause.
14 Okay?

15 A. Okay.

16 Q. With that out of the way, could you
17 state your name for the record?

18 A. Yes. My name is Kimberly Lexlaura
19 Bunting.

20 Q. And what is your current mailing
21 address?

22 A. 400 Baer Street, Jersey Shore,
23 Pennsylvania 17740.

24 Q. And (inaudible)?

1 A. Can you restate that?

2 Q. Is there anybody in the room with
3 you right now?

4 A. No, ma'am, there is not.

5 Q. Do you have any notes with you?

6 A. No, ma'am, I do not.

7 Q. Okay. How did you prepare for
8 today's deposition?

9 A. I looked online to see if I can see
10 kind of what was going on and anything that I
11 could see for public record. Other than that,
12 I haven't really done anything. This is my
13 first deposition. So I haven't -- I don't
14 really know how to prepare.

15 Q. That's totally understandable.

16 When you did your online
17 search, were you able to find anything?

18 A. Yes, I was.

19 Q. Would you mind just telling us what
20 you reviewed online?

21 A. Yes. It wasn't anything that was
22 for Ric Szabo versus Muncy Industries. It was
23 for Shandi -- I can't recall her last name --
24 and Ric, it looks like on a prior suit that

1 had taken place, nothing that was giving me
2 any knowledge into this particular suit in
3 question.

4 Q. So it was Shandi and Ric on the same
5 caption at the top?

6 A. Yes.

7 Q. Okay. Did you see a complaint?

8 A. It was kind of hard to follow along.
9 They were just advising that it was some
10 employee discrimination suit that was against
11 Muncy Industries.

12 Q. Okay. And I will just put on the
13 record that I believe that you were looking at
14 this case. It used to have both of them. Now
15 it's just Ric, but that works.

16 Did you speak to anyone today
17 about -- or with anyone about today's
18 deposition?

19 A. No, I have not.

20 Q. I don't mean offense by this.

21 Are you currently taking any
22 drugs or medication that would interfere with
23 your ability to understand my questions or to
24 tell the truth?

1 A. No, ma'am.

2 Q. When (inaudible) against Muncy?

3 A. Can you restate the question?

4 Q. When did you learn about Mr. Szabo's
5 claims against Muncy?

6 A. That I saw online? Is that what you
7 mean?

8 Q. Were you aware of the -- when you
9 worked for Muncy, were you aware that he had
10 filed a lawsuit?

11 A. I was not employed with Muncy at the
12 time that I became -- it was brought to my
13 attention that he had.

14 Q. Okay. Have you ever pleaded guilty
15 or no contest to or been convicted of a felony
16 or a misdemeanor?

17 A. No, ma'am, I have not.

18 Q. Have you ever been arrested or
19 charged for a crime, regardless of whether or
20 not you were convicted?

21 A. No, ma'am, I have not.

22 Q. What is your highest level of
23 education?

24 A. Master's degree.

1 Q. Okay. And in what?

2 A. I have an MBA in business
3 administration.

4 Q. When did you get that degree?

5 A. I graduated December 2017.

6 Q. Okay. From where?

7 A. Texas A&M University-Commerce.

8 Q. What was your first job after
9 graduating college -- getting your master's?
10 I am sorry.

11 A. I was actually currently employed at
12 Muncy Industries when I had graduated with my
13 MBA.

14 Q. So then when did you officially
15 start working for Muncy?

16 A. In 2014.

17 Q. 2014? Who hired you?

18 A. I apologize. I am sorry. I got
19 hired at Muncy in 2017. I graduated
20 December 2017. My apologies.

21 Q. So it was 2017 you were hired, not
22 2014?

23 A. Correct. I apologize. I misspoke.

24 Q. That's totally okay. Who hired you

1 in 2017?

2 A. Ophelia Fetter.

3 Q. Okay. Who is she to the company?

4 A. She is the president and owner of
5 Muncy Industries.

6 Q. Okay. What was your position at the
7 time of your hiring?

8 A. Inside sales representative.

9 Q. What were your job duties in this
10 position?

11 A. As an inside sales representative,
12 it was my responsibility to report into the
13 office and answer incoming phone calls, in
14 addition to placing outgoing phone calls in
15 regards to quoting activity for our customers,
16 work on special projects deemed from our vice
17 president of sales and order entry; and
18 working with our cross-functional teams to
19 ensure successful order entry, as well as
20 shipping of orders.

21 Q. Okay. Did you have the authority to
22 hire and fire any employees?

23 A. No, I did not.

24 Q. Were you involved in decisions to

1 hire and fire employees?

2 A. Not that I recall.

3 Q. Okay. And were you an inside sales,
4 you said, representative?

5 A. Yes.

6 Q. From January 8, 2018, until you
7 left?

8 A. No. I was promoted to an inside
9 sales manager.

10 Q. Okay. What were your job duties in
11 your position as inside sales manager?

12 A. I had two representatives that would
13 be my direct reports and I was to oversee the
14 sales department; that included quoting and
15 order entry, as well as customer escalations
16 that would take place, and also bring any
17 issues to the attention of the vice president
18 of sales.

19 Q. When did you get that promotion?

20 A. I do not recall a specific date.

21 Q. And who was the vice president of
22 sales during that period?

23 A. Jason Fetter.

24 Q. Okay. Once you were an inside sales

1 manager, did you have authority to hire and
2 fire anyone?

3 A. No, I did not.

4 Q. Okay. What was your work schedule
5 in this position?

6 A. You mean my hours and the days of
7 the week that I worked?

8 Q. Yes.

9 A. It was Monday through Friday, 8:00
10 to 4:30.

11 Q. 8:00 to 4:30. And was this every
12 day? Did it change?

13 A. That was what my hours were. I did
14 often work after hours, but that was the hours
15 that -- the shift that I was required to work
16 every day.

17 Q. Were you paid hourly or were you a
18 salary employee?

19 A. I was a salary employee.

20 Q. What was your salary?

21 A. I do not recall a specific number.

22 Q. So you worked overtime sometimes.

23 Was that your decision or were
24 you asked to?

1 A. I do not recall.

2 Q. Okay. Were you paid when you worked
3 overtime?

4 A. As a salary employee, no, I wasn't
5 compensated for my overtime time.

6 Q. Okay. And you said you reported to
7 Mr. Fetter?

8 A. Yes, I did.

9 Q. What was your relationship with
10 Mr. Fetter?

11 A. How do you mean?

12 Q. Did you have a good relationship?
13 Was it just strictly professional? Did you
14 like him?

15 A. It was strictly just professional
16 relationship. It was a working one. There
17 would be times where, obviously, because he
18 was traveling a majority of the time, I would
19 say about 90 percent, if not more was based on
20 the phone.

21 So phone calls that either
22 myself or the sales staff would place into him
23 to seek approval on a variety of different
24 topics, but it was a professional

1 relationship.

2 Q. Okay. Did you ever have to travel
3 for work?

4 A. Yes, I did.

5 Q. And when you traveled, was it after
6 4:30 or before 8:00?

7 A. Yes.

8 Q. Were you paid for that travel --

9 A. As a salary --

10 Q. -- time?

11 A. As a salary employee, I took that as
12 my duties.

13 Q. Okay. And you are no longer with
14 Muncy, correct?

15 A. That is correct.

16 Q. Did you resign or were you
17 terminated?

18 A. I resigned.

19 Q. Why did you leave?

20 A. I got another position with higher
21 wages and higher responsibility.

22 Q. Okay. So you're currently working
23 there now?

24 A. No. I am actually not working at

1 that place any longer.

2 Q. Okay. Are you currently working
3 right now?

4 A. No, I am not actually. I am not.

5 Q. (Inaudible)?

6 A. Can you restate that?

7 Q. Are you familiar with Ric Szabo?

8 A. Yes, I am familiar with him.

9 Q. Did you work with him?

10 A. I did.

11 Q. How (inaudible)?

12 A. How often?

13 Q. Yes.

14 A. Once he was hired onto Muncy and was
15 traveling for the calibration team, Ric and I
16 had to work closely together in regards to
17 scheduling calibration trips, as well as I was
18 to -- what we call a cert check. I was to
19 double-check his certification work that he
20 would be doing on site.

21 And, also, if he had any issues
22 when he was out in the field that required
23 troubleshooting or to kind of discuss what the
24 issue was, I was his first contact.

1 Q. Okay. Did you at any point give him
2 assignments or was that not part of
3 scheduling?

4 A. So my responsibility was to provide
5 him with a calibration schedule, which would
6 be a list of -- like, an itinerary, for lack a
7 of better word, of just communicating which
8 days he was to travel, what cities, and he
9 also had calibration equipment.

10 I would be advising whether
11 that calibration equipment would be arriving
12 on site or where that would be stored so he
13 understood where the equipment was for the
14 job.

15 Q. If I am understanding correctly, it
16 was your decision where Ric or the other
17 calibration techs would be traveling, you
18 picked those assignments, or did you just --
19 sorry -- did you just send the itinerary out?

20 A. I just sent the itinerary out. The
21 decisions as to where Ric Szabo would go and
22 the duration in which he would be there is
23 something that would have approval from the
24 vice president of sales.

1 Q. Okay. So the calibration
2 technicians had no authority to choose where
3 they would go? They got that assigned to them
4 by Mr. Fetter?

5 A. So there would be an instance, we
6 would have a group of customers. We would try
7 to consolidate them into a certain area.

8 Once we knew that those
9 customers needed to be calibrated, Jason and
10 myself would be talking about what would be
11 the correct manner in which travel should go,
12 what would be the most cost effective way to
13 go.

14 And then it was my -- once
15 Jason had provided his approval to me that
16 that trip -- that, you know, location A, B,
17 and C; and the order in which that was
18 supposed to be done; and the manner in which
19 the equipment was supposed to move -- it was
20 my responsibility to get with Ric to
21 communicate that plan that's been approved by
22 Jason.

23 And the manner in which I did
24 that was either phone call or I would send an

1 e-mail advising kind of calibrations week of.
2 And it was Ric's responsibility to go and book
3 his flights and hotel. I did not have a
4 company card. So Ric had to go ahead and make
5 his own travel arrangements.

6 Q. You said when they would go.

7 Does that mean when in the day
8 or just when in the week, from site to site?

9 A. When in the week. So more like days
10 of the week. Let's say, Monday he would
11 travel this day; Tuesday, Wednesday, Thursday.
12 I organized it based on when he was to fly out
13 and I would keep it just on the day as to when
14 he was to fly back in.

15 Q. Okay. On a typical day, when would
16 the traveling, if you know, from job site to
17 job site take place?

18 A. Usually, from my understanding, it
19 would be from Monday trying to fly out to
20 whatever direction and then fly back in by
21 Friday. There were times where it did not
22 require week travel and it would be two days,
23 three days. Sometimes it did not take a full
24 week.

1 Sometimes there were times that
2 he -- that Ric could go ahead and drive to
3 those locations and did not require a flight,
4 but the majority of the time it would be
5 focused on Monday to fly out if it required a
6 week trip and fly back in on Friday.

7 Q. Okay. Are you familiar with how
8 long a calibration typically takes?

9 A. I do not recall.

10 Q. Okay. Do you know how much time a
11 calibration technician would spend driving
12 from job site to job site?

13 A. I do not recall.

14 Q. As far as you know, was Mr. Szabo
15 ever involved in the hiring or firing of
16 employees?

17 A. I don't recall.

18 Q. Do you know if he was involved in
19 making decisions about hiring and firing
20 employees?

21 A. I do not recall.

22 Q. As far as you know, did Mr. Szabo
23 supervise any other Muncy employees and direct
24 their work?

1 A. I don't recall.

2 Q. As far as you know, did Mr. Szabo,
3 in his position as a calibration technician,
4 have authority to make independent choices
5 free from immediate direction or supervision?

6 A. If it involved -- when Ric was on a
7 calibration site, he had the designation, from
8 my understanding, that if there was something
9 technically that could be troubleshooted on
10 site as a calibration technician, that Ric
11 would go ahead and troubleshoot in those
12 technical aspects.

13 However, if it did involve
14 customer involvement, if it involved cost, if
15 it involved staying an extra night or if there
16 was a greater level of impact, he was required
17 to communicate that to myself and/or Jason
18 Fetter.

19 Q. Okay. And then did you or
20 Mr. Fetter approve it or did someone else have
21 that work?

22 A. So mostly Ric would communicate with
23 me. Because Muncy did not have a after-hours
24 troubleshooting staff. So I would be the

1 first contact that he would have.

2 I would go ahead and evaluate
3 what concern that Ric had. If there was a
4 customer impact, cost impact or anything that
5 I would consider to be a high impact, then I
6 would communicate with Jason myself or I would
7 communicate to Ric to contact Jason directly
8 to explain the situation to get the designated
9 approval.

10 Q. Okay. You say they didn't have an
11 after-hours line.

12 Would he be calling you after
13 hours because of a time difference or because
14 of when the work would be done? And I don't
15 know if -- was it a time difference issue that
16 he was calling after hours?

17 A. Sometimes there would be. If I
18 remember correctly, they were one hour behind
19 us or two, but there were other times, aside
20 from just a time zone difference, that he
21 would be currently actively on the job or he
22 would be traveling for a flight or there would
23 be something that would be taking place,
24 either calibration equipment not arriving or

1 arriving on the site, that was not directly
2 tied to the time difference. It was based on
3 the criteria of the job that needed to be
4 done.

5 Q. When you were working for Muncy, did
6 you have to send Mr. Fetter a daily update
7 regarding what you had done that day by
8 e-mail?

9 A. Usually, as an inside sales
10 representative and then an inside sales
11 manager, Jason Fetter would be calling in for
12 updates as to what were the levels for sales
13 that day, anything that he needed to be made
14 aware of. Aside from that occurrence, there
15 was a time in February 2020, that Muncy was
16 subject to a -- kind of cyber attack, and
17 there was technology that was lost.

18 Due to the amount of efforts it
19 took to get our data back into the system, I
20 was required to provide updates to Mr. Fetter,
21 as well as the other Fetters, as to what
22 progress that the inside sales team has made
23 on trying to have those efforts in regarding
24 getting the data.

1 So prior to that time, I did
2 not have to send e-mail communication on a
3 consistent basis; however, once that computer
4 situation happened, I was required to report
5 based on our progress and what we were doing.

6 Q. Okay. Did he ask you to send him a
7 daily or weekly goal list? Like, things you
8 wanted to accomplish during that day or that
9 week?

10 A. Not that I recall.

11 Q. Okay. Do you know if the
12 calibration technicians and Mr. Szabo had to
13 do that?

14 A. I have heard of the practice being
15 done for the calibration team, as they had to
16 do both in-house and out-of-house
17 calibrations. And, obviously, when they were
18 not traveling and they had to be in-house, I
19 had heard that there was a goal list or a task
20 list for a level of accountability, to ensure
21 that tasks were being worked on.

22 Q. And you said that if something had
23 to do with sales, Mr. Szabo had to get
24 authority, approval for that?

1 A. In regards to a level of impact if
2 he was on a job. So if something had
3 happened. If it was on the site and it was
4 technical, that he could go ahead and easily,
5 you know, provide another shackle or kind of
6 work technically on that. He can go ahead and
7 do that.

8 However, if it involved a
9 customer or a level of cost or he missed his
10 flight or he had to -- realized the job was
11 going to take longer and he needed to stay an
12 extra day, then all of those decisions he
13 would reach out to myself as the contact.

14 I would deem that getting ahold
15 of Jason, and Mr. Fetter would be the one who
16 would be making that decision of how to
17 proceed due to the level of cost impact to the
18 company.

19 Q. As far as you know, were the
20 calibration technicians involved in signing up
21 new clients or contracting with anyone?

22 A. I do know that with our calibration
23 techs, with their level of experience,
24 Mr. Szabo individually, just because he had

1 worked with Joe Roberts, who was someone very
2 known in the industry, that he was asked to
3 communicate with customers sometimes to gain
4 more knowledge of what Muncy has to offer. I
5 will say that efforts of that was 100 percent
6 driven by our vice president of sales.

7 Q. So he did that on Mr. Fetter's
8 authority and direction?

9 A. Yes.

10 Q. Okay. I apologize for not asking
11 this before.

12 What was his specific job
13 title?

14 A. Mr. Szabo?

15 Q. Yes.

16 A. If I recall correctly, I think he
17 was just a calibration technician.

18 Q. Do you know if being a calibration
19 technician is something that requires a
20 degree?

21 A. Not that -- I don't recall.

22 Q. And as far as you know, did all of
23 the Muncy calibration technicians have the
24 same level of education?

1 A. In regards to education, I do not
2 recall.

3 Q. How about training --

4 A. I --

5 Q. -- on-the-job or before?

6 A. I will say from looking at our
7 calibration technician staff, Ric was someone
8 that had the most experience and he also aided
9 with writing -- due to his experience, he
10 helped write procedures for Muncy.

11 He was the first calibration
12 tech. So he really provided Muncy direction
13 and aided as to the calibration techs that
14 followed after him and added to the team. He
15 was instrumental and crucial in that
16 development based on his knowledge and
17 experience that he brought.

18 Q. All right. And when he had a hand
19 in these procedures, could he implement any
20 procedure without approval from Mr. Fetter or
21 anyone else?

22 A. No.

23 MS. KRAMER: Okay. That's all
24 the questions I have. Thank you for your

1 time today. Attorney Stapp may have
2 some.

3 BY MR. STAPP:

4 Q. Miss Bunting, can you hear me?

5 A. Yes, I can.

6 Q. Okay. I just have a couple of
7 things I want to make sure I understand.

8 You left Muncy Industries for a
9 job that paid more money; is that correct?

10 A. That's correct.

11 Q. And, I think, was part of that
12 decision based on the fact you had obtained
13 your degree in the MBA program?

14 A. Yes.

15 Q. With regard to Mr. Szabo, is it
16 correct that when he started at Muncy
17 Industries, there really wasn't a calibration
18 program at Muncy Industries?

19 A. That is correct.

20 Q. And, in fact, Mr. Szabo was hired to
21 create the calibration program?

22 A. I do not recall.

23 Q. Okay. Did Mr. Szabo write the
24 procedures for the calibration program at

1 Muncy Industries?

2 A. Yes, he did; he contributed to
3 writing them. In regards to if there was any
4 function teams that helped that he was able to
5 collaborate with, I do not recall that.

6 Q. And Mr. Szabo was the one who
7 actually taught other people at Muncy
8 Industries how to do the calibration program
9 once it was created; is that correct?

10 A. Correct.

11 Q. In fact, I think Mr. Szabo helped
12 Jason Fetter understand the calibration
13 program itself; is that right?

14 A. That is correct.

15 Q. You were asked about Mr. Szabo and
16 his prior employment at Robert's.

17 Are you aware that there is an
18 e-mail where Mr. Szabo offered to Jason Fetter
19 to reach out to Robert's clients?

20 A. No, I was not aware.

21 Q. You weren't privy to that e-mail?

22 A. No, not that I recall.

23 Q. Okay. If I understood your
24 testimony correctly today, is it fair to say

1 that you, as the scheduling person, were
2 trying to schedule calibration trips between
3 Monday to Friday?

4 A. That was the initial goal, correct.

5 Q. And you were trying to keep the
6 travel part of that included in that
7 Monday-to-Friday time frame; is that right?

8 A. When it was possible, yes.

9 Q. And if I understood your testimony
10 correctly, you left it up to Mr. Szabo, since
11 he had the company credit card, to actually
12 schedule any kind of plane flights or trains
13 or things of that nature; is that correct?

14 A. That is correct. Because I did not
15 have a company card. It was based on the
16 approval of Jason Fetter. Ric was to go ahead
17 and execute the appropriate flights and hotel
18 arrangements necessary based on that approved
19 plan.

20 Q. And to your knowledge was Mr. Szabo
21 allowed to travel in the 8:30 to 5 o'clock
22 time frame if he wanted to?

23 A. Can you restate the question?

24 Q. Sure. Was Mr. Szabo allowed by

1 Muncy Industries to travel during the
2 8:30 a.m. to 5:00 p.m. time frame?

3 A. If there was a calibration that was
4 scheduled during that time, a part of that
5 plan, then, yes, he would be required to
6 travel beforehand.

7 Q. And, of course, he would have to be
8 able to get a flight that was available during
9 those hours, too, I would assume; is that
10 right?

11 A. Correct, but I will say that that --
12 it would have to be approved on the plan that
13 was approved by Jason Fetter.

14 Q. Okay. And at some point while you
15 were still employed, did Muncy start to hire
16 other calibration technicians?

17 A. That is correct.

18 Q. And did those calibration
19 technicians travel with Mr. Szabo?

20 A. That is correct.

21 Q. And when Mr. Szabo was on site for a
22 customer of Muncy Industries with another
23 calibration technician, was he in charge of
24 their work?

1 A. There were times, yes, where there
2 would be another calibration tech on site and
3 Ric would be showing the ropes, so to speak,
4 and making sure that things were following
5 based on these procedures that Ric had a hand
6 in processing; that's correct.

7 Q. Okay. So he was basically teaching
8 and supervising those employees; is that
9 correct?

10 A. When it was on site, when they were
11 actively doing a calibration, that's correct.

12 Q. Okay. And my understanding from
13 your testimony is that Ric was salary when he
14 worked for Muncy Industries; is that correct?

15 A. I was not privy, nor understood what
16 his current standing was.

17 Q. Okay. But when you were working for
18 Muncy Industries, you were salary; is that
19 right?

20 A. That's correct.

21 Q. And it sounds like from your
22 testimony here today that there were times
23 that you worked after hours; is that right?

24 A. That is correct.

1 Q. Did you ever consider filing some
2 type of lawsuit against Muncy Industries
3 trying to ask for overtime?

4 A. No, I did not.

5 Q. Why didn't you think to do that?

6 A. As a salary employee, I took that as
7 in my job responsibility. Also, I will say
8 that during my time with Muncy, Muncy has --
9 was good to me in regards to bonuses based on
10 performance. So I did not find it necessary
11 to -- as a salary employee, I just did what I
12 had to do to get the job done.

13 Q. Are you aware that Mr. Szabo
14 received bonuses when he worked for Muncy
15 Industries?

16 A. I was not privy to that information.

17 Q. Okay. Are you aware of -- and I
18 understand you may have been gone, but are you
19 aware that Mr. Szabo had written an e-mail to
20 other Muncy Industries' customers following
21 his departure --

22 MS. KRAMER: I am going to
23 object to that. It's irrelevant.

24 MR. STAPP: I'm just asking if

1 she was aware of it. She may not be.

2 BY MR. STAPP:

3 Q. Are you aware of an e-mail,
4 Miss Bunting, that Mr. Szabo sent to Muncy
5 Industries' customers indicating that he had
6 left?

7 A. Not that I recall.

8 Q. Okay. Are you surprised that
9 Mr. Szabo filed a lawsuit against Muncy
10 Industries?

11 A. I don't know how to answer that.

12 Q. Okay. Well, you indicated earlier
13 you were trying to find out what this case was
14 about. This is a case about wages and
15 overtime.

16 Are you surprised that
17 Mr. Szabo filed suit against Muncy Industries?

18 A. I don't know how to answer that. I
19 am sorry.

20 Q. That's okay. With regard to travel
21 arrangements for Mr. Szabo, if I understand
22 your testimony correctly, he handled his own
23 travel arrangements; is that right?

24 A. He would be responsible for booking

1 the arrangements based on the plan that was
2 approved by Jason Fetter.

3 Q. Okay.

4 A. Ric could not go out on his own
5 and -- if we had designated a certain flight
6 at a certain time with a certain airline on a
7 specific day, Ric couldn't go ahead and just
8 book another flight outside of that plan. It
9 had to be based on the plan.

10 MR. STAPP: Okay. I think
11 that's all the questions I have,
12 Miss Bunting.

13 MS. KRAMER: I just have a few
14 follow-ups on that.

15 BY MS. KRAMER:

16 Q. Miss Bunting, did you clock in and
17 out in the morning and the afternoon when you
18 got to work and left work?

19 A. No, I did not, not that I recall.

20 Q. Okay. And in your time with Muncy,
21 did you ever miss lunch?

22 A. I apologize. It's been a very long
23 time since I have been at that job. Yes, that
24 is correct. You had to clock in for the day

1 and clock out for the day.

2 Q. Okay. Did you have to clock in and
3 out when you went to lunch?

4 A. I do not recall.

5 Q. Okay. Do you remember if in your
6 time there you ever missed lunch, worked
7 through lunch?

8 A. Yes.

9 Q. You did. Okay. Were you paid for
10 that time?

11 A. I was a salary employee. It was my
12 decision to work past.

13 Q. Okay. Then just to confirm, you had
14 your master's already when you started at
15 Muncy?

16 A. No. No. I had -- I was working on
17 my master's degree when I started at Muncy,
18 but I had successfully graduated during my
19 time at Muncy, and then I had left about three
20 years after.

21 Q. So when you were promoted to inside
22 sales manager, did you have a master's at that
23 point or if you don't remember?

24 A. I believe that I did have my

1 master's when I was promoted to the inside
2 sales manager position.

3 MS. KRAMER: That's all the
4 questions I have. Thank you.

5 MR. STAPP: I don't have any
6 other questions. Thank you for your
7 time.

8 (Witness was excused.)

9 (Deposition concluded at
10 4:00 p.m.)

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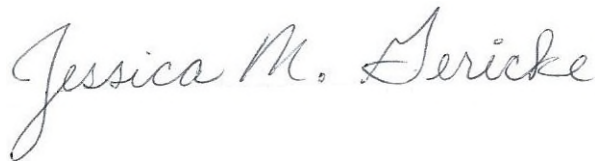
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Kimberly Lexlaura Bunting

C E R T I F I C A T E

I HEREBY CERTIFY that prior to the commencement of the examination, KIMBERLY LEXLAURA BUNTING, was remotely sworn by me to testify to the truth and that the proceedings, evidence, and objections are contained fully and accurately in the stenographic notes taken by me upon the deposition taken on June 15, 2022, and this is a true and correct transcript of same.



Jessica M. Gericke, RPR, CCR-NJ,
and Notary Public

(The foregoing certification of this transcript does not apply to any reproduction of the same by any means, unless under the direct control and/or supervision of the certifying reporter.)

Kimberly Lexlaura Bunting

1 I have read the foregoing transcript
2 of my deposition given on June 15, 2022, and
3 it is true, correct and complete, to the best
4 of my knowledge, recollection and belief,
5 except for the corrections noted hereon and/or
6 list of corrections, if any, attached on a
7 separate sheet herewith.

8

9

Kimberly Lexlaura Bunting

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12

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14 Subscribed and sworn to
15 before me this ____ day
16 of _____, 20__

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20 Notary Public

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Kimberly Lexiaura Bunting

1 ERRATA SHEET

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3 PAGE LINE CHANGES OR CORRECTION AND REASON

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20 I have inspected and read my deposition as
captioned above and have listed all changes
21 and corrections above, along with my reasons
therefor.

22

23 DATE: _____

24 Signature of Deponent: _____